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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MJL 12, LLC, a Nevada limited liability  
 company,

Plaintiff,

v.

TRIUMPH INTERNATIONAL, LLC, a  
 California limited liability company,

Defendant.

Case No. 2:24-cv-00122-GMN-EJY

**STIPULATION AND [PROPOSED]  
 ORDER EXTENDING THE TIME  
 FOR PLAINTIFF TO FILE AND SERVE  
 ITS RESPONSE TO DEFENDANT'S  
 MOTION TO DISMISS**

(First Request)

Pursuant to Federal Rule of Civil Procedure 6(b) and LR IA 6-1, the parties, by and through their undersigned counsel, hereby agree and stipulate to extend the date for Plaintiff MJL 12, LLC to file and serve its response to Defendant Triumph International, LLC's Special Motion to Dismiss Plaintiff's Seventh Claim Pursuant to Nevada Anti-SLAPP Statute; and Motion to Dismiss Sixth and Seventh Claims Pursuant to Fed. R. Civ. P. 12(b)(6) and Second Claim Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) (ECF No. 13), filed on April 26, 2024 (hereinafter, the "Motion"), and, in support of the same, state the following:

1. Plaintiff filed its Complaint for Declaratory and Other Relief on January 17, 2024. (ECF No. 1.) On February 26, 2024, Plaintiff sent Defendant a request to waive formal service of the Summons and Complaint. (ECF No. 7.) Defendant executed the waiver on March 11, 2024. (*Id.*) As a result, Defendant's answer or other response to the Complaint was due on April 26, 2024. (*Id.*)

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2. On April 26, 2024, Defendant filed the Motion seeking to dismiss Plaintiff's seventh claim for relief pursuant to Nevada's Anti-SLAPP statute and seeking to dismiss Plaintiff's sixth and seventh claims pursuant to Rule 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure.

3. Plaintiff has requested, and Defendant has agreed, that Plaintiff may have until May 17, 2024 to respond to the Motion in order to accommodate the schedules of Plaintiff's counsel.

4. The parties therefore agree to extend the date for Plaintiff to file and serve its response to the Motion from May 10, 2024, to May 17, 2024.

5. This is the first request for an extension of time to respond to the Motion.

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6. The parties agree, based on the foregoing, that good cause exists for the requested extension.

**IT IS SO AGREED AND STIPULATED:**

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By: /s/ Jonathan W. Fountain

By: /s/ Todd L. Bice

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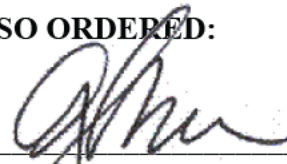
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*Attorneys for Defendant*

*Triumph International, LLC*

**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE

DATED: May 9, 2024